

Bureau of Land Management [BLM]

09/07/2018

State of Alaska
222 W 7th Ave #13
Anchorage, AK 99513-7504

RE: Development of the Willow Master Development Plan (MDP)

To BLM Alaska,

I'm writing you to join the public discussion about the forthcoming Environmental Impact Statement ["EIS"] and would offer the following suggested comments:

- The EIS should include an analysis of the positive socio-economic benefits of the project. Specifically, please consider the following:

1. The positive benefits of new roads on subsistence hunting. The new roads built for nearby drill sites CD5 and GMT1 have enabled hunting by individuals who previously did not have tundra-capable vehicles or snow machines and/or who did not have the time needed for an overland trip to hunt. Roads also enhance emergency response for local activities.

2. The impact of the billions of dollars that will be generated for the NPR-A Impact Mitigation Grant Program which focuses on impacted areas.

3. The economic benefit generated by providing thousands of construction jobs, hundreds of permanent jobs, thousands of indirect jobs, and billions of dollars in property taxes, severance taxes, royalties and income taxes.

4. Science-based approach to determine impacts to caribou migration and other Alaskan wildlife.

5. The protections to flora and fauna already afforded by the BLM's 2013 Integrated Activity Plan (IAP) and prior mitigation measures and best practices.

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- The analysis should be done in a timely, efficient manner.
 - The Willow area is estimated to contain 400-750 MMBO with peak production of nominally up to 100MBBLS/per day. This would help increase North Slope production and put more oil in the Trans-Alaska Pipeline System. The proposed Willow project would also help meet the primary purpose of NPR-A, which is petroleum production to serve America's energy requirements. I believe that a strong oil & gas industry adds to the US national security interests and benefits the entire country.
 - Development of the proposed >\$5 billion project would provide substantial benefits to local and state economies through:
 - Alaska hire for jobs created during construction and for continuing operations
 - State of Alaska tax revenues
 - Federal revenue sharing for impacted communities and the State of Alaska from royalties and lease rentals/bonuses
 - new production to help meet domestic energy demand, while US oil & gas production and export impacts the global commodity market.
 - *ConocoPhillips* [NYSE: "COP"] is the right company to develop the Willow project based on its demonstrated ability to conduct its operations in an

environmentally responsible way and in a manner that respects and protects the subsistence lifestyle of local communities.

- The proposed Willow project minimizes impacts, maintains high standards for safety and emergency response, and leverages contemporary North Slope best management practices. Willow will make use of existing road and pipeline infrastructure in the Colville River and Kuparuk River Units to minimize footprint and environmental impacts.

- COP proposed Willow project conforms to the BLM's 2013 Integrated Activity Plan (IAP). A review of new data and information shows there are no appreciable changes in the physical, biological, or social resources associated with the project study area since the 2013 IAP. In addition to significant historic data gathered in this general area, the company has collected extensive biological and engineering data since 2017 to inform the Willow EIS process.

- COP/Alaska is committed to a robust and thorough EIS process that both complies with the National Environmental Policy Act (NEPA), and other regulatory processes, and is also performed in an efficient and timely manner. In addition to minimizing environmental impacts, alternatives developed should also include a strong consideration of safety and emergency response capabilities and impacts.

- COP is committed to working with North Slope stakeholders to address concerns about development in the NPRA.

Sincerely yours,

Mark H. Pillsbury
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